

REMARKS

With respect to the objection of the drawings, claim 7 is a dependent claim on 6 which is in the Beauregard format. Thus, it basically covers software. However, a string of cases have indicated that in order to cover software, a tangible medium must be claimed. That medium is an article that stores instructions. Thus, the step of storing the instructions is not claimed, but a medium that stores the instructions is what is claimed. The medium is shown in the figures. It is indicated that the first step of the flow chart, shown in Figure 2, namely, block 26, is resident on the HCI firmware 22, also shown in Figure 1. The second step of the software 28 is done in the link manager firmware 20, also shown in Figure 1. Thus, the residence of such instructions in the medium that stores them is clearly depicted. Since the medium is what is claimed, the medium is all that at most need be shown in the figures.

Therefore, reconsideration is respectfully requested.

Claim 1 calls for handling the system-wide state of the wireless device through a host controller interface firmware. The material cited in claims 31-34 has no discussion of host controller interface firmware or handling the system-wide state of the device in such a way. But, more importantly, there is no handling of the state of each link of the wireless device through the link manager firmware. There is no discussion of handling system-wide state versus each link with separate firmware as set forth in the claim.

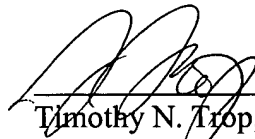
The so-called HCI firmware 204 is for "sending and receiving protocol messages over the wireless medium." Thus, if the HCI 204 is a host controller interface, there is no indication that it handles the system-wide state of the device. And, even if there is a host controller interface in the cited reference, it is not clear where the link manager would reside. And, even if there were such a link manager, there is no indication that the link manager handles the state of each link.

In connection with the rejection of claim 4, it is indicated that the link manager firmware is 210 and 232 in Figure 4. Item 210 is the LMP and, while item 210 is mentioned in paragraph 32, its operation is never discussed. Thus, there seems to be no way to deduce the claimed operation from such a description. It is also suggested that the link manager firmware includes the item 232 in Figure 4. Item 232 is the LMP in the LAN 244. Other than to simply list it in a list of items, in paragraph 34, there is no discussion whatsoever of what it does. Thus, again, there seems to be no way to deduce that it does the claimed operation.

Therefore, reconsideration of the rejection is respectfully requested.

Respectfully submitted,

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